



40 Broad Street, 7th Floor
New York, NY 10004
Tel. (212) 943-9080
Fax (212) 943-9082

Adrianna R. Grancio
Partner
agrancio@vandallp.com

April 29, 2025

VIA ECF

Hon. Peggy Kuo, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Trustees of the Plumbers Local No. 1 Welfare Fund et al. v. Spray in Place Solutions, Inc. et al*, 24 CV 2568 (KAM)(PK)

Dear Judge Kuo,

This firm represents the Plaintiffs in the above-referenced case. We write jointly with counsel for Defendants Spray in Place Solutions, LLC (“SIPS”) and Atlantic Specialty Insurance Company (“ASIC,” together with SIPS, the “Defendants”) in accordance with Rule IV of your Honor’s Individual Practice Rules to respectfully request an extension of time to complete discovery. The current deadline to complete discovery is April 30, 2025. *See* ECF Minute Entry and Order dated January 23, 2025.

Promptly following the discovery conference held on March 25, 2025, the parties finalized a stipulation governing the production of audit documents. The parties continue to work cooperatively pursuant to the stipulation to facilitate the completion of the audit covering the period through December 31, 2022.

The parties remain committed to resolving this litigation amicably and without the need for prolonged or protracted discovery. Accordingly, to allow sufficient time for completion of the audit and to engage in meaningful settlement discussions, the parties respectfully request a ninety (90) day extension of the discovery deadline, through July 29, 2025. This is the parties’ second request for an extension of the discovery deadline; the first request was granted.

We thank the Court for its attention to this matter and sincerely apologize for the lateness of this request.



Respectfully submitted,

/s/
Adrianna R. Grancio, Esq.
Attorneys for Plaintiffs

/s/
Emanuel Kataev, Esq.
Attorneys for Defendants